



## El Dorado County Water Agency

Dale Coco, M.D.  
*El Dorado Irrigation District*

Duane Wallace  
*South Tahoe P.U.D.*

Shiva Frentzen  
*Board of Supervisors*

Michael Ranalli  
*Board of Supervisors*

Brian K. Veerkamp  
*Board of Supervisors*

Ken Payne  
*Interim General Manager*

September 28, 2016

California Air Resources Board  
2030TargetScopingPlanUpdate@arb.ca.gov

Subject: CARB & CalEPA Public Workshop on the Transportation Sector to Inform Development of the 2030 Target Scoping Plan Update

Dear CARB & CalEPA,

Please accept this comment letter from the El Dorado County Water Agency (EDCWA) in response to the California Air Resources Board and California Environmental Protection Agency's transportation sector workshop on the AB 32 Scoping Plan. The EDCWA develops countywide water planning and advocates for the water interests of El Dorado County. Given the nexus of water, transportation and energy use, EDCWA is invested in promoting clean energy opportunities for our region. The El Dorado region of the Sierra Nevada is a unique area in California that spans rural towns and popular lake and mountain resort communities. AB 32 has the potential to significantly impact El Dorado County residents and commercial businesses in their efforts to address climate change and reduce greenhouse gas emissions.

### Identifying Low-Income Communities

EDCWA recommends that AB 32 programs not employ CalEnviroScreen to identify low-income, disadvantaged communities (DAC). Many rural communities in the Sierras no longer qualify under CalEnviroScreen's version 2.0 as a DAC, despite current economic struggles. Much of the El Dorado County region is economically isolated and disadvantaged, with unemployment rates that have remained higher than state averages and incomes across the region in decline since 2010. In 2014, 60.4% of students in the Lake Tahoe Unified School District participated in the free and reduced school lunch program.

As such, EDCWA recommends that AB 32 implementation not use the CalEnviroScreen criteria, as this will result in the exclusion of economically disadvantaged rural communities in the Sierra Nevada. To identify low-income communities for program eligibility, EDCWA uses the California Department of Housing and Community Development's income guidelines and suggests that CARB and CalEPA reference these guidelines for AB 32 implementation where applicable.

### Defining Population Requirements

Rural communities in the Sierra Nevada also serve as popular visitor destinations, often exploding in population during peak seasonal periods. EDCWA advises that AB 32 implementation base any population requirements on both visitor and permanent population estimates, to more accurately account for resort communities, like Tahoe.

Tahoe must be able to support a significant influx of peak seasonal visitors, during both the summer and winter periods, with up to 3 million visitors each year, and 300,000 visitors on peak days, a tremendous increase from an estimated year-round resident population of 50,000. The visitor population equates to higher demands on the electrical grid, loads that resort communities must have the capacity to support during seasonal fluctuations, but also opportunities for notable impacts on energy efficiency savings. There is an inequitable burden placed on rural, resort local populations to construct and maintain public works infrastructure services for the visitor population. As

renewable energy and energy efficiency will help mitigate the added energy burdens of these visitors, their population impacts should be accounted for.

Additionally, performance or cost effectiveness criteria are often based off of urban areas, which may not adequately apply to rural areas. Rural communities can be at a disadvantage if they are compared against urban area baselines, due to differences in population density. EDCWA suggests that AB 32 cost effectiveness tests pull from data from both rural and urban communities.

### **Funding Needs**

To help showcase the effectiveness and success of energy efficient and renewable technologies, EDCWA recommends providing funding for demonstration projects, especially for rural, mountainous environments. El Dorado County offers some of the most challenging terrain and weather in California, with high elevation, cold winter temperatures and snowy conditions. This demanding environment sparks the need for education and outreach on the performance of renewables and energy efficiency measures, which can often be best demonstrated through successful pilot programs.

Thank you for considering our comments and for the opportunity to submit recommendations to CARB and CalEPA on the AB 32 Scoping Plan. We hope that implementation of AB 32 will take into account the needs of California's rural, mountainous communities.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Payne, P.E.", is positioned above the typed name.

Ken Payne, P.E.  
Interim General Manager